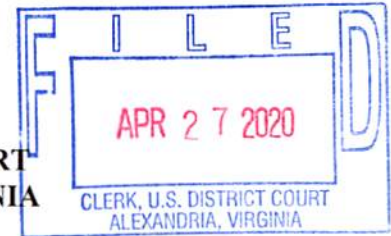


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20cv484

**FILED UNDER SEAL PURSUANT TO
LOCAL RULE 5**

**NOTICE OF HEARING RE MOTION FOR A
PROTECTIVE ORDER TEMPORARILY SEALING DOCUMENTS**

PLEASE TAKE NOTICE that should the Court find it appropriate to hear oral argument on Plaintiffs' Motion for a Protective Order Temporarily Sealing Documents, Plaintiffs respectfully request that oral argument be set on or before May 1, 2020, or as soon thereafter as the matter may be heard. This request is driven by the urgency of the relief requested in Amazon's Application for an *Ex Parte* Temporary Restraining Order and an Order to Show Cause Why a Preliminary Injunction Should Not Issue, which seeks to protect and preserve evidence and assets including a multi-million dollar payment that Defendants' former joint venture partner (IPI) intends to make to Defendants Sterling NCP FF LLC and Manassas NCP FF LLC on or before May 15, 2020.

NOTICE OF HEARING RE MOTION FOR A
PROTECTIVE ORDER TEMPORARILY
SEALING DOCUMENTS

Dated: April 27, 2020

Respectfully submitted,



Elizabeth P. Papez (*pro hac vice* application pending)
Patrick F. Stokes (*pro hac vice* application pending)
Travis S. Andrews (Va. State Bar No. 90520)
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
Telephone: (202) 955-8500
Facsimile: (202) 467-0539
epapez@gibsondunn.com
pstokes@gibsondunn.com
tandrews@gibsondunn.com

Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.